

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joseph Harrilla, being first duly sworn, hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the United States Department of Labor, Office of Inspector General (“DOL-OIG”) and have been so since August 2009. I am currently assigned to the Roanoke Field Office. I am a graduate of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center. I have a Master of Science in Administration, and a Financial Crimes Investigator Certificate. I have more than 20 years’ experience conducting criminal investigations involving matters of fraud, theft, conspiracy, false statements, and forgery. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal felony offenses. While assigned to the Roanoke Field Office, I have conducted criminal investigations of individuals, organizations and businesses related to the Commonwealth of Virginia (“VA”) Unemployment Insurance (“UI”) Benefit Program and the Pandemic Unemployment Assistance Program (“PUA”).

2. Based on your affiant’s training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of federal law have

been committed by the individuals listed below and in the table provided in the conclusion.

3. The information in this affidavit is derived from your affiant's personal knowledge, public records, law enforcement personnel, and other investigative techniques. This affidavit does not include every known fact about this investigation. Your affiant believes this information to be both truthful and reliable.

Background Concerning the CARES Act and Pandemic Benefits

4. This investigation involves a conspiracy to defraud the United States of pandemic unemployment benefits by Leelynn Danielle CHYTKA (CHYTKA), Gregory Marcus TACKETT (Greg TACKETT), Jeffery Ryan TACKETT (Jeff TACKETT) and numerous others, many of whom were incarcerated at the time the claims for benefits were filed.¹

5. Unemployment Insurance (UI) is a state-federal program that provides monetary benefits to eligible lawful workers. Although state workforce agencies (SWAs) administer their respective UI programs, they must do so in accordance with federal laws and regulations. UI payments are intended to provide temporary financial assistance to lawful workers who are unemployed through no fault of their own. Each state sets its own additional requirements for eligibility, benefit amounts,

¹ This Court has previously issued arrest warrants on criminal complaints regarding CHYTKA, Greg TACKETT, and Jeff TACKETT. No additional criminal complaints are sought for these three co-conspirators at this time.

and length of time benefits can be paid. Generally, UI weekly benefit amounts are based on a percentage of your earnings over a base period. In the Commonwealth of Virginia, the Virginia Employment Commission (VEC) administers the UI program.

6. On March 13, 2020, the President declared the ongoing Coronavirus Disease 2019 (“COVID-19”) pandemic of sufficient severity and magnitude to warrant an emergency declaration for all states, tribes, territories, and the District of Columbia pursuant to section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121-5207 (the “Stafford Act”).

7. On March 18, 2020, the President signed the Families First Coronavirus Response Act (“FFCRA”) into law. The FFCRA provides additional flexibility for state UI agencies and additional administrative funding to respond to the COVID-19 pandemic. The Coronavirus Aid, Relief, and Economic Security (“CARES”) Act was signed into law on March 27, 2020. It expands states’ ability to provide UI for many workers impacted by COVID-19, including for workers who are not ordinarily eligible for UI benefits. The CARES Act provided for three new UI programs: Pandemic Unemployment Assistance (“PUA”); Pandemic Emergency Unemployment Compensation (“PEUC”); and Federal Pandemic Unemployment Compensation (“FPUC”).

8. The first program, PUA, provides for up to 39 weeks of benefits to qualifying individuals who are self-employed, seeking part-time employment, or

otherwise would not qualify for either regular UI or extended benefits under state or federal law. Under the PUA provisions of the CARES Act, a person who is a business owner, self-employed worker, independent contractor, or gig worker can qualify for PUA benefits administered by VEC if he/she previously performed such work in Virginia and is unemployed, partially unemployed, unable to work, or unavailable to work *due to a COVID-19 related reason*. A claimant must answer various questions to establish his/her eligibility for PUA benefits. The claimant must provide specific personally identifiable information (PII), including his/her name, Social Security Number, date of birth, and mailing address. The claimant must also identify a qualifying occupational status and COVID-19 related reason for being out of work. The eligible timeframe to receive PUA is from weeks of unemployment beginning on or after January 27, 2020 through December 31, 2020.²

9. The second program, PEUC, is a state-federal program that provides for up to 13 weeks of benefits to individuals who have exhausted regular UI under state or federal law, have no rights to regular UI under any other state or federal law, are not receiving UI under the UI laws of Canada, and are able to work, available for work, and actively seeking work. Under this program, states must offer flexibility in meeting the “actively seeking work” requirement if individuals are unable to search

² At the time of this affidavit, additional eligibility rules are being promulgated for pandemic unemployment benefits provided pursuant to new legislation signed into law on March 11, 2021. This new law and its associated benefits are not implicated by this complaint.

for work because of COVID-19, including because of illness, quarantine, or movement restriction. The eligible timeframe to receive PEUC includes weeks of unemployment beginning after the respective state has an established agreement with the federal government through December 31, 2020. The earliest being April 5, 2020.

10. The third program, FPUC, provides individuals who are collecting regular UI, PEUC, PUA, and several other forms of unemployment compensation with an additional \$600 per week. The eligible timeframe to receive FPUC was from weeks of unemployment beginning after the respective state had an established agreement with the federal government through July 31, 2020. The earliest being April 5, 2020.

11. On August 8, 2020, after FPUC expired, the President signed a Presidential Memorandum authorizing FEMA to use disaster relief funds pursuant to Section 408 of the Stafford Act to provide supplemental payments for lost wages to help ease the financial burden on individuals who were unemployed as a result of COVID-19. The “Lost Wages Assistance Program” (“LWAP”) served as a temporary measure to provide an additional \$300 per week via a total of \$44 billion in FEMA funds. The period of assistance for LWAP was August 1, 2020 to December 27, 2020.

12. In total, more than \$300 billion in additional federal funds for UI were appropriated in 2020.

13. The PUA, FPUC, and LWAP programs (collectively, “pandemic unemployment benefits”) are administered by the various states, including the Commonwealth of Virginia, but their benefits are funded by the federal government. In order to receive pandemic benefits, an applicant must access a website maintained and administered by the VEC and file a claim. Separate claims are not filed for PUA, FPUC, and LWAP. Rather, a single claim for PUA, if approved, results in an approved claim for the additional FPUC and LWAP benefits as well.

14. Individuals are only eligible for pandemic unemployment benefits if they are unemployed for reasons related to the COVID-19 pandemic and are otherwise available to work and are seeking employment.

15. Once an applicant is at the website, the applicant is required to enter PII including name, date of birth, Social Security Number, email address, phone number, and physical address. An applicant is then required to answer a series of questions to determine eligibility and payment amount. An applicant must then attest, under penalty of perjury, that the information provided in the claim application is true and accurate.

16. Upon completion, the application is submitted to the VEC. If approved, the applicant can choose whether to have the pandemic unemployment benefits

deposited directly into a bank account of their choosing, or the funds can be loaded on a pre-paid debit card which is then shipped to the applicant via United States Postal Service to the address listed on their application.

17. Payments for pandemic unemployment benefits are based on a seven-day period, from Sunday through Saturday. Thus, the benefits recipient must certify every seven days that he or she: was ready, willing and able to work each day; was seeking full time employment; did not refuse any job offers or referrals; and had reported any employment during the week and the gross pay or other payments received.

18. In or around June 2020, the VEC began reviewing UI and PUA claims to identify fraudulent claims. By August 2020, the VEC officials had learned from other states that inmates in correctional facilities were receiving UI benefits.

19. Incarcerated individuals are not eligible for pandemic unemployment benefits insomuch as their unemployment was a result of their incarceration and not related to COVID-19. These individuals are unemployed due to their own criminal conduct and not due to COVID-19 reasons. Additionally, because incarcerated individuals are no longer able to actively seek full-time employment due to their incarceration, they are not eligible to receive pandemic unemployment benefits for the period of time they are incarcerated.

20. Consequently, the VEC obtained a list of approximately 39,000 inmates housed by the Virginia Department of Corrections and cross-matched the Virginia UI and PUA claims to people who were shown to be claimants on the inmate list. The analysis revealed over 6,000 claims filed on the behalf of inmates in Virginia, totaling over \$85 million in paid claims.

21. The Southwest Virginia Regional Jail Authority-Duffield (SWRJA-Duffield) and Southwest Virginia Regional Jail Authority-Abingdon (SWRJA-Abingdon) are both located in the Western District of Virginia.

22. 108 Twin Circle Drive, Lebanon, VA 24266 is in the Western District of Virginia.

PROBABLE CAUSE

19. Your affiant's investigation determined that beginning in May 2020 CHYTKA, Greg TACKETT, and Jeff TACKETT developed a scheme and artifice to file fraudulent claims for pandemic unemployment benefits via the VEC website. The scheme and artifice was to submit claims for themselves and those individuals detailed in this affidavit, each ineligible to receive pandemic unemployment benefits, by making materially false representations including, but not limited to: that the applicant was unemployed as a result of COVID-19; using a fictitious employer as the name of the last employer when the applicant became unemployed due to

COVID-19; that the applicant was ready, willing, and able to work each day; and that the applicant was actively seeking full-time employment.

20. Your affiant's investigation determined that because pandemic unemployment benefits were paid on a weekly basis, the scheme was a continuing scheme whereby CHYTKA agreed and conspired to file weekly re-certifications for the claims they submitted. In so doing, CHYTKA re-certified and re-verified the same materially false representations as stated above for each claim submitted, on numerous occasions.

21. CHYTKA told investigators that at the time the scheme was devised, Jeff TACKETT was incarcerated at the Southwest Virginia Regional Jail Authority – Duffield (SWVRJA-Duffield) and incapable of accessing a computer system in order to file his own fraudulent claim. Jeff TACKETT provided all PII required to file his claim to CHYTKA via email and telephone communications. CHYTKA and Greg TACKETT then filed a claim on behalf of Jeff TACKETT.

22. After CHYTKA, Greg TACKETT, and Jeff TACKETT began receiving their pandemic unemployment benefits, the scheme broadened to include other inmates at the SWVRJA-Duffield and other family members and friends of CHYTKA, Greg TACKETT, and Jeff TACKETT, each of whom were then known to be ineligible for pandemic unemployment benefits.

23. In furtherance of the scheme, Jeff TACKETT approached other individuals who were then incarcerated at the SWVRJA-Duffield and told them that he had a way to make money by submitting claims for pandemic unemployment benefits on their behalf. The inmates then provided their PII to Jeff TACKETT, who then conveyed that information to CHYTKA and Greg TACKETT either via email or telephone communications for the purpose of filing a fraudulent claim.

24. Other individuals who were *not* incarcerated at the time of their filing provided their own PII either directly to CHYTKA and Greg TACKETT, or through other co-conspirators, for the purpose of filing fraudulent claims.

25. Some individuals agreed that in exchange for filing their respective fraudulent claims, CHYTKA, Greg TACKETT, and Jeff TACKETT could keep a portion of the money received. Other individuals gave their PII to CHYTKA and Greg TACKETT in exchange for controlled substances, including methamphetamines. CHYTKA, Greg TACKETT, and Jeff TACKETT filed additional fraudulent claims for other individuals based solely on their close family or personal relationships.

26. CHYTKA told investigators that in order to effect the object of the conspiracy and to receive pandemic unemployment benefits, CHYTKA and Greg TACKETT used the address of the residence in which they lived at the time: 108 Twin Circle Drive, Lebanon, VA 24266 on all claim applications they filed. By

doing this, CHYTKA and Greg TACKETT ensured that the government pre-paid debit cards used to disburse pandemic unemployment payments were all sent to their address. After filing for claims, the VEC mailed monetary determination letters, Personal Identification Numbers (PINs), and in most cases, Mastercard debit cards via United States Postal Service to the address listed on the applications: 108 Twin Circle Drive, Lebanon, VA 24266.

27. A search of VEC records revealed there were thirty-seven (37) pandemic unemployment claim applications, including the claims for all the individuals for whom warrants are being sought via this affidavit, using the address of 108 Twin Circle Drive, Lebanon, Virginia 24266.

28. A public record check of that address found that 108 Twin Circle Drive, Lebanon, Virginia, 24266 was the residence of CHYTKA, and Greg TACKETT. This address is located in the Western District of Virginia.

29. CHYTKA, Greg TACKETT, and Jeff TACKETT were all listed on the VEC 108 Twin Circle List as applying for and receiving pandemic unemployment benefits. CHYTKA's application was filed with the VEC on May 11, 2020; Greg TACKETT's application was filed on May 20, 2020 and Jeff TACKETT's application was filed on June, 3, 2020. (CHYTKA, Greg TACKETT, and Jeff TACKETT have each been charged for their roles in this conspiracy.)

30. An analysis of the information listed on the VEC 108 Twin Circle List shows that for the claimant application security question “What is your mother’s maiden name?” “Walls” was provided as the answer twelve (12) times out of the thirty-seven (37) records. “Walls” is CHYTKA’s maiden name and a known alias of CHYTKA’s. The telephone number XXX-XXX-5856 was used seventeen (17) times out of the thirty-seven (37) records. This telephone number is known to be CHYTKA’s cell phone number. CHYTKA also told investigators that on every application she filed, including for every individual detailed in this affidavit, she fraudulently represented that the applicant was previously employed by a fictitious employer. CHYTKA listed various fraudulent employers for these co-conspirators. For example, CHYTKA listed “Appen” on 24 of the 37 applications. CHYTKA explained that “Appen” is a company that she previously worked for. CHYTKA also listed “Ace Tree Service” on eight of the 37 applications, explaining that “Ace Tree Service” was a company that Greg TACKETT once worked for. Still others were listed as various fictitious company names.

31. Investigators interviewed eighteen (18) inmates at the SWVRJA-Duffield and SWVRJA-Abingdon facilities. As detailed below, several inmates provided statements stating Jeff TACKETT approached inmates and told them he had a way of submitting claims for pandemic unemployment benefits on their behalf. Both Jeffrey WISEMAN and John C. JOHNSON Sr. told investigators several of the

individuals shared a common “pod” together at the SWVRJA-Duffield facility and they commonly discussed the plan to submit information for pandemic unemployment benefits. The incarcerated individuals provided their Social Security Numbers and dates of birth to Jeff TACKETT, who then conveyed that information to CHYTKA and Greg TACKETT via email and telephone communications for the purpose of filing the fraudulent claims.

32. **CHYTKA** was interviewed by investigators on January 26, 2021 while incarcerated at the Lincoln County Detention Center located in Lincolnton, North Carolina. After waiving her Miranda rights, CHYTKA confessed to filing fraudulent claims for pandemic unemployment benefits for herself, Jeff TACKETT, Greg TACKETT and at least thirty-four (34) other individuals associated with the address of 108 Twin Circle Drive, Lebanon, Virginia.³ CHYTKA told investigators the following:

a. In May, 2020, CHYTKA discovered that she could make money by applying for pandemic unemployment benefits via the VEC website. On May 11, 2020, CHYTKA filed a claim with the VEC. The filing of this fraudulent PUA claim resulted in \$17,688.00 being paid to CHYTKA.

³ Consistent with her statement to investigators, on March 18, 2021, CHYTKA entered a plea of guilty in the United States District Court for the Western District of Virginia to charges of Conspiracy to Defraud the United States (18 U.S.C. § 371), Conspiracy to Commit Mail Fraud (18 U.S.C. § 1349), and Aggravated Identity Theft (18 U.S.C. § 1028A). Your affiant considers this to be strong support as to the reliability of the statement she provided to investigators.

b. With the assistance of other individuals as detailed below, including Jeff TACKETT and Greg TACKETT, CHYTKA filed every claim for pandemic unemployment assistance for those individuals associated with 108 Twin Circle Drive. Within days after every claim was filed, CHYTKA and Greg TACKETT received via United States Post a monetary determination letter, PIN code, and a Mastercard debit card in each applicant's name at 108 Twin Circle Drive, Lebanon, VA 24266. In order to continue to receive weekly deposits to the pre-paid debit card, CHYTKA made subsequent weekly re-certifications on the applicant's behalf.

c. CHYTKA advised that she attempted to start a business called "D&R Accounting" to facilitate the filing of unemployment claims. According to CHYTKA, "D&R" stood for "Danielle and Roo." "Roo" is a known alias for Greg TACKETT. CHYTKA explained to investigators that she wanted to make her business "legit" – that instead of taking other people's unemployment money, she wanted to eventually charge people a fee for her service of filing claims.

d. CHYTKA classified the other thirty-four (34) individuals into three general categories: 1) Inmates at the SWVRJA-Duffield whose PII was passed on to her by Jeff TACKETT so that CHYTKA could file fraudulent claims with VEC; 2) Personal friends of CHYTKA's and the TACKETTs' who provided CHYTKA with their PII so that CHYTKA could file their fraudulent claims with the VEC; and 3) Acquaintances of Greg TACKETT's who provided CHYTKA with PII so that

CHYTKA could file fraudulent claims with the VEC, in exchange for Greg TACKETT providing them with controlled substances.

e. After successfully filing for pandemic unemployment benefits on behalf of inmates, CHYTKA and Greg TACKETT used the debit cards to their own benefit, and CHYTKA would occasionally send money to the inmates' commissary accounts in jail as directed by Jeff TACKETT. There were several inmates for whom CHYTKA filed fraudulent claims, and who received pandemic unemployment benefit disbursements through the VEC but did not receive any money on their commissary account.

f. CHYTKA told investigators that on or around the dates their respective claims were filed with the VEC, CHYTKA's and Greg TACKETT's family, friends, and acquaintances met with CHYTKA at her residence located at 108 Twin Circle Drive, Lebanon, VA. As detailed further below, each individual provided CHYTKA with his/her PII for the purpose of CHYTKA filing a fraudulent claim. CHYTKA entered this information into the VEC website and filed the application due to her familiarity with the system.

g. After successfully filing these claims, CHYTKA and Greg TACKETT usually used the debit cards for their own benefit, while providing co-conspirators with cash, illegal drugs, or other items of value (including providing individuals with vehicles, appliances, and other items).

h. CHYTKA filed all claims electronically by accessing the VEC website using her personal computer from her home at 108 Twin Circle Drive, Lebanon, VA 24266.

i. CHYTKA told investigators everyone for whom she filed fraudulent claims knew she was filing fraudulent unemployment claims, and if they say they thought they were just getting stimulus, “they are lying.” CHYTKA said “they...they knew it was fraud pretty much...nobody thought it was stimulus. Everybody was like ‘oh – I’m gonna get my stimulus *on top* of this.’”

33. **Greg TACKETT**

a. On May 20, 2020, CHYTKA filed a claim with the VEC on Greg TACKETT’s behalf. The filing of this fraudulent claim resulted in not less than \$18,320.00 being paid to Greg TACKETT, including PUA and LWAP payments.

b. Your affiant and investigators interviewed Greg TACKETT on January 12, 2021. After waiving his Miranda rights, Greg TACKETT admitted to signing up for pandemic unemployment benefits in May 2020. When asked by investigators on how he assisted CHYTKA with the scheme to file fraudulent claims, Greg TACKETT told investigators “I mean, I just signed people up...”.

c. Greg TACKETT told investigators the reason there were so many names associated with the 108 Twin Circle Drive address was because there was a business operated out of the house called D&R Accounting LLC. On a recorded

jailhouse telephone call between Greg TACKETT and Veronica MULLINS on January 11, 2021, Greg TACKETT admitted “we filed for people under the accountant business.” Knowing jailhouse calls are monitored, Veronica MULLINS interrupted Greg TACKETT, saying “watch what you say...”.

34. Jeff TACKETT

a. CHYTKA told investigators that once she and Greg TACKETT each began receiving pandemic unemployment benefits, CHYTKA discussed the scheme with Jeff TACKETT and explained how he could also receive money. On or about May 31, 2020, CHYTKA filed a claim on Jeff TACKETT’s behalf. The filing of this fraudulent claim resulted in not less than \$18,004.00 being paid to Jeff TACKETT, including PUA and LWAP payments.

b. As further detailed below, Jeff TACKETT assisted CHYTKA and Greg TACKETT in filing claims for pandemic unemployment assistance for co-conspirators who were incarcerated at the time of their filing. For each of these co-conspirators, Jeff TACKETT conveyed the PII required so CHYTKA could file fraudulent claims.

c. Investigators interviewed Jeff TACKETT on January 12, 2021 while he was incarcerated at SWVRJA-Abingdon. After waiving his Miranda rights, Jeff TACKETT admitted to passing on a “lot of people’s” PII to CHYTKA for the purpose of filing fraudulent claims, and that CHYTKA paid Jeff TACKETT for

passing on the information. Jeff TACKETT then told investigators he “had no clue” it was for unemployment, instead thinking it was stimulus money. Investigation determined these statements to be false. In addition to the message between CHYTKA and Jeff TACKETT above, numerous email messages between Jeff TACKETT and CHYTKA, and between Jeff TACKETT and various other inmates reveal frequent discussion of filing for *unemployment* claims. In a recorded jailhouse video chat on December 14, 2020, Jeff TACKETT – who was out of jail at the time – demonstrated his *complete* knowledge of the scheme to submit fraudulent claims for pandemic unemployment when he spoke with a friend, B.J.:

Jeff TACKETT: Hey – did you ever sign up on that fucking shit that everyone’s getting?

B.J.: No.

Jeff TACKETT: Well you should getit ends, today’s the last fucking day, well tomorrow – the 15th.

B.J.: Wait – um – unemployment?

Jeff TACKETT: Yeah.

B.J.: Nigga - I’m not tryin’ to fuckin’ catch no fed charge

Jeff TACKETT: Ayight, but, you ain’t going to, but...

35. Jimmy W. BARNETTE (BARNETTE)

a. CHYTKA told investigators that BARNETTE was incarcerated with Jeff TACKETT when she filed a fraudulent claim on his behalf.

b. Between or about July 10, 2020 and on or about July 17, 2020, BARNETTE provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT then conveyed the PII to CHYTKA so she

could file a claim for pandemic unemployment benefits with the VEC on BARNETTE's behalf.

c. On or about July 17, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on BARNETTE's behalf. The filing of this fraudulent claim resulted in not less than \$15,192.00 being paid to the pre-paid debit card assigned to BARNETTE, including PUA and LWAP payments.

CHYTKA and Greg TACKETT did not, however, provide the debit card to BARNETTE.

d. BARNETTE was interviewed by investigators while he was incarcerated at the SWVRJA-Duffield. After waiving his Miranda rights, BARNETTE told investigators he was unaware an unemployment claim had been filed on his behalf with the VEC. Investigation determined this statement to be false. At the time his fraudulent claim was filed, BARNETTE was housed in the same pod at SWVRJA-Duffield as Jeff TACKETT. Interviews with Jeffery D. WISEMAN and John C. JOHNSON Sr. revealed that Jeff TACKETT frequently discussed *unemployment claims* with everyone in the pod. Witnesses told investigators it was commonly discussed among those in the pod.

e. On December 10, 2020, after Jeff TACKETT was released from jail, Jeff TACKETT confirmed he was in possession of BARNETTE's unemployment benefits debit card in an email sent to BARNETTE. In response to this email on

December 16, 2020, BARNETTE demonstrated his understanding of the object of the scheme, and his willing participation in the scheme:

Communications with Tackett , Jeff, Jtackett91@yahoo.com

Jeff Tackett

Jimmy Barnette

12/10/2020 6:04AM

Aye dawg how you doi...

Aye dawg how you doing . I got your unemployment I just need ss# to file the claims . just call me 2763456497

Jimmy Barnette

Jeff Tackett

12/16/2020 3:15PM

RE: Aye dawg how you doi...

07/11/1992 thanks bro i can really use the money right now

36. George L. BUCKLES (BUCKLES)

a. CHYTKA told investigators that BUCKLES is an acquaintance of CHYTKA's and Greg TACKETT's through illicit drug activity. In or about July, 2020, BUCKLES became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about July 22, 2020, BUCKLES went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA, Greg TACKETT, and others. BUCKLES provided his PII to CHYTKA, including his Social Security Number and date of birth. CHYTKA entered the information and filed the claim due to her familiarity with the system.

c. On or about July 22, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on BUCKLES's behalf.

d. The filing of this fraudulent claim resulted in not less than \$5,560.00

being paid to the debit card assigned to BUCKLES, including PUA and LWAP payments. CHYTKA told investigators that she and Greg TACKETT did not provide the debit card to BUCKLES. Instead, CHYTKA and Greg TACKETT used the debit card for their benefit while occasionally providing cash and drugs to BUCKLES.

e. On January 25, 2021, BUCKLES was interviewed by investigators while incarcerated at the SWVRJA-Abingdon. After waiving his Miranda rights, BUCKLES denied even knowing CHYTKA or Greg TACKETT. Investigation determined this statement to be false. When questioned by investigators, CHYTKA said that BUCKLES was one of several people who were gathered at her house, engaged in illicit drug activity, when they discussed the fraudulent claims for unemployment. CHYTKA told investigators BUCKLES was present at her house and sat next to her when she filed his fraudulent claim.

37. Joshua S. CARROLL (CARROLL)

a. CHYTKA told investigators that CARROLL is an acquaintance of Greg TACKETT's through illicit drug activity. In or about July 2020, CARROLL became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about July 7, 2020, CARROLL went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. CARROLL provided his PII to CHYTKA, including his Social Security Number and date of

birth. Although CARROLL was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

c. On or about July 7, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on CARROLL's behalf. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to the debit card assigned to CARROLL, including PUA and LWAP payments. CHYTKA told investigators that she and Greg TACKETT did not provide the debit card to CARROLL. CHYTKA and Greg TACKETT used the debit card for their benefit. CHYTKA explained CARROLL was associated with Greg TACKETT through illicit drug activity and his fraudulent claim was filed in exchange for drugs and cash.

38. Eugene A. GRIZZLE (Eugene GRIZZLE)

a. CHYTKA told investigators that Eugene GRIZZLE is a friend of Greg TACKETT's and Jeff TACKETT's through illicit drug activity. In or about July, 2020, Eugene GRIZZLE became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about July 7, 2020, Eugene GRIZZLE went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. Eugene GRIZZLE provided his PII to CHYTKA, including his Social Security Number and date of birth.

c. On or about July 7, 2020, CHYTKA filed a claim with the VEC

seeking pandemic unemployment benefits on Eugene GRIZZLE's behalf. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to the debit card assigned to Eugene GRIZZLE, including PUA and LWAP payments. CHYTKA and Greg TACKETT did not provide the debit card to Eugene GRIZZLE. CHYTKA and Greg TACKETT used the debit card for their benefit, while occasionally providing Eugene GRIZZLE drugs.

d. Eugene GRIZZLE told investigators "I had him (Greg TACKETT) file for my unemployment...but I didn't know nothing about it." Eugene GRIZZLE went on to tell investigators that Greg TACKETT told him they (Greg TACKETT and CHYTKA) were filing unemployment for a few people and "if I could get my stuff together, they'd file for mine." Eugene GRIZZLE then told investigators Greg TACKETT contacted Eugene GRIZZLE's mother asking her to provide Eugene GRIZZLE's birth certificate and photo identification in order to get his money. Eugene GRIZZLE told investigators his brothers, Ryan GRIZZLE and Curtis MULLINS both had Greg TACKETT file unemployment for them, and his brother Curtis MULLINS "talked me into it, too." Eugene GRIZZLE told investigators Greg TACKETT asked Eugene GRIZZLE to give him \$500 of the money received.

e. Jailhouse video chats revealed that on January 27, 2021, in a recorded call to his mother, Eugene GRIZZLE acknowledged to his mother "You know how Roo filed for my unemployment?...But I ain't eligible for unemployment..."; "I told

them that Ryan (Ryan GRIZZLE) was filing for his...”; “You better tell Ryan and Brown (Curtis MULLINS), both to watch it!” (“Brown” is a nickname for Curtis MULLINS.)

39. Ryan E. GRIZZLE (Ryan GRIZZLE)

a. CHYTKA told investigators that Ryan GRIZZLE is an acquaintance of CHYTKA’s and Greg TACKETT’s through illicit drug activity. In or about July 2020, Ryan GRIZZLE became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about July 14, 2020, Ryan GRIZZLE went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. Ryan GRIZZLE provided his PII to CHYTKA, including his Social Security Number and date of birth. Although Ryan GRIZZLE was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

c. On or about July 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on Ryan GRIZZLE’s behalf. The filing of this fraudulent claim resulted in not less than \$15,950.00 being paid to the debit card assigned to Ryan GRIZZLE, in PUA payments. CHYTKA and Greg TACKETT did not provide the debit card to Ryan GRIZZLE. CHYTKA and Greg TACKETT attempted to use the debit card for their own benefit, but the card was locked when

they received it.

40. Joseph N. HALL (HALL)

a. CHYTKA told investigators that HALL is an acquaintance of CHYTKA's through illicit drug activity. In or about June 2020, HALL became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about June 10, 2020, HALL provided his PII, including his Social Security Number and date of birth, to his girlfriend, who then conveyed the information to CHYTKA for the purpose of filing a fraudulent claim.

c. On or about June 10, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on HALL's behalf. The filing of this fraudulent claim resulted in not less than \$17,530.00 being paid to the debit card assigned to HALL, including PUA and LWAP payments. CHYTKA and Greg TACKETT did not provide the debit card to HALL. CHYTKA and Greg TACKETT used the debit card for their benefit while occasionally providing cash and drugs to HALL.

41. Wesley W. HICKMAN (HICKMAN)

a. CHYTKA told investigators that HICKMAN was incarcerated with Jeff TACKETT when she filed a fraudulent claim on HICKMAN's behalf.

b. In or about July 2020, HICKMAN provided his PII to Jeff

TACKETT, including his Social Security Number and date of birth. Jeff TACKETT provided the PII to CHYTKA so she could file a fraudulent claim on HICKMAN's behalf.

c. On or about July 17, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on HICKMAN's behalf. The filing of this fraudulent claim resulted in not less than \$18,004.00 in PUA and LWAP payments being paid to the pre-paid debit card assigned to HICKMAN. CHYTKA and Greg TACKETT did not, however, provide the debit card to HICKMAN. CHYTKA and Greg TACKETT used the debit card for their benefit until they were apprehended, and occasionally sent money to HICKMAN's commissary account in jail.

d. On December 10, 2020, after Jeff TACKETT was released from jail, Jeff TACKETT confirmed he was in possession of HICKMAN's unemployment benefits in an email sent to HICKMAN. In response to this email on December 10, 2020, HICKMAN demonstrated his understanding of the object of the scheme, and his desire to receive the money.

Jeff Tackett	Wesley Hickman	12/10/2020 5:05AM
Yo whats up dawg. Ay...		
Yo whats up dawg. Aye i got some bread for you call. Me when you get this and I got some even better news. My brother did get your unemployment shit but I took that shit and I can reset it and get you like 600 back by Monday I just need your ss# call me [REDACTED]		
Wesley Hickman	Jeff Tackett	12/10/2020 6:19AM
RE: Yo whats up dawg. Ay...		
yooo, watsup broski, hah yeah i figured he did bro, but shit yeah ill call u bro my out time at 2:30 today im in max im tray server bak here ill call u bro what u been doin man? u aight, shit be carful out there bro, streets r fukin trippy, hah but yeah bro i could use some bread real shit, ill shoot u a name love u bro, -Wiggy We\$ keep ya head up..		
Pop out at ya party im with the gang, hah		

42. Jacob H. HICKS (HICKS)

a. CHYTKA told investigators that HICKS is an acquaintance of CHYTKA's and Greg TACKETT's through illicit drug activity. In or about June 2020, HICKS became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about June 14, 2020, HICKS sent his PII, including his Social Security Number and date of birth, to CHYTKA via Facebook Messenger for the purpose of filing a fraudulent claim.

c. On or about June 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on HICKS's behalf. The filing of this fraudulent claim resulted in not less than \$16,488.00 being paid to the debit card assigned to HICKS, in PUA and LWAP payments. CHYTKA and Greg TACKETT did not provide the debit card to HICKS. CHYTKA and Greg TACKETT used the debit card for their benefit while occasionally providing drugs and cash to HICKS.

43. **Ajay JOHNSON**

a. CHYTKA told investigators that Ajay JOHNSON is a friend of Greg TACKETT's and Jeff TACKETT's, the son of John C. JOHNSON Sr. and brother of John C. JOHNSON Jr.. In or about June 2020, Ajay JOHNSON was incarcerated with Jeff TACKETT when he became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On June 11, 2020, Ajay JOHNSON was released from jail. Upon his release, CHYTKA and Greg TACKETT picked up Ajay JOHNSON from jail and brought him back to 108 Twin Circle Drive, Lebanon, VA 24266. On or about June 12, 2020, Ajay JOHNSON provided his PII, including his Social Security Number and date of birth, to CHYTKA for the purpose of filing a fraudulent claim.

c. On or about June 12, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on Ajay JOHNSON's behalf. The filing of this fraudulent claim resulted in not less than \$18,162.00 being paid to the debit card assigned to Ajay JOHNSON, including PUA and LWAP payments. CHYTKA and Greg TACKETT did not initially provide the debit card to Ajay JOHNSON. CHYTKA and Greg TACKETT used the debit card for their benefit. In exchange, CHYTKA and Greg TACKETT provided Ajay JOHNSON a vehicle and cash on several occasions. CHYTKA and Greg TACKETT eventually gave Ajay JOHNSON the debit card assigned to him.

d. Ajay JOHNSON was interviewed by investigators in January 2021 while he was incarcerated. After waiving his Miranda rights, Ajay JOHNSON told investigators that he heard about the unemployment scheme from Jeff TACKETT when he was in jail with Jeff TACKETT. Ajay JOHNSON told investigators Jeff TACKETT was speaking with people in the pod about getting them a “big sum of money” if they gave him their Social Security Number and birth date.

e. Ajay JOHNSON admitted after he was released from jail on June 11, 2020, CHYTKA filed his unemployment for him. Ajay JOHNSON told investigators after CHYTKA filed his unemployment, Greg TACKETT told him he “only got back \$3,500”, which was what Ajay JOHNSON received. Ajay JOHNSON told investigators the arrangement he had with CHYTKA and Greg TACKETT was that Ajay JOHNSON agreed to pay them \$500 in exchange for them filing his unemployment. Ajay JOHNSON said Greg TACKETT paid him \$3,000 in cash a couple of weeks after they filed, but that Ajay JOHNSON then used that money to buy a car (a Mazda Miata) from Greg TACKETT. Ajay JOHNSON admitted that a week or two later, he received a pre-paid debit card that received weekly unemployment payments, which he continued to use until he was again incarcerated.

44. John C. JOHNSON Jr.

a. CHYTKA told investigators that John C. JOHNSON Jr. is a friend of Greg TACKETT’s and Jeff TACKETT’s, the son of John C. JOHNSON Sr. and

brother of Ajay JOHNSON. In or about June 2020, John C. JOHNSON Jr. was incarcerated with Jeff TACKETT when he became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. In or about June 2020, John C. JOHNSON Jr. provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT then conveyed that PII to CHYTKA so she could file a fraudulent claim on John C. JOHNSON Jr.'s behalf.

c. On or about June 24, 2020, CHYTKA filed a claim for pandemic unemployment benefits with the VEC on John C. JOHNSON Jr.'s behalf. The filing of this fraudulent claim resulted in not less than \$14,434.00 being paid to the pre-paid debit card assigned to John C. JOHNSON Jr., in PUA and LWAP payments. CHYTKA and Greg TACKETT did not, however, provide the debit card to John C. JOHNSON Jr.. In exchange, CHYTKA and Greg TACKETT provided John C. JOHNSON Jr. cash on several occasions. CHYTKA and Greg TACKETT attempted to use the debit card for their benefit, but the card was ultimately locked due to fraudulent activity.

45. John C. JOHNSON Sr.

a. CHYTKA told investigators that John C. JOHNSON Sr. is a friend of Greg TACKETT's and Jeff TACKETT's, and the father of Ajay JOHNSON and John C. JOHNSON Jr.. In or about June 2020, John C. JOHNSON Sr. was incarcerated

with Jeff TACKETT when he became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. In or about June 2020, John C. JOHNSON Sr. provided his PII to Jeff TACKETT, including his Social Security Number, date of birth, and mother's maiden name. Jeff TACKETT then conveyed that PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on John C. JOHNSON Sr.'s behalf.

c. On or about June 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on John C. JOHNSON Sr.'s behalf. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to the pre-paid debit card assigned to John C. JOHNSON Sr., including PUA and LWAP payments. CHYTKA and Greg TACKETT did not, however, provide the debit card to John C. JOHNSON Sr. CHYTKA and Greg TACKETT used the debit card for their benefit. In exchange, CHYTKA and Greg TACKETT provided cash to John C. JOHNSON Sr. on several occasions. CHYTKA and Greg TACKETT also provided John C. JOHNSON Sr. a Chevy S10 truck.

d. John C. JOHNSON Sr. was interviewed by investigators on January 25, 2021 while he was incarcerated at SWVRJA-Duffield. After waiving his Miranda rights, John C. JOHNSON Sr. admitted he had previously been incarcerated in pod 4A at SWVRJA-Duffield along with Jeff TACKETT and others. John C. JOHNSON

Sr. said in May 2020, Jeff TACKETT spoke with several people in the pod, and told them that Jeff TACKETT was going through his brother, Greg TACKETT, to get unemployment. John C. JOHNSON Sr. said the whole pod was sitting around discussing the fraudulent unemployment claims with Jeff TACKETT.

e. John C. JOHNSON Sr. initially told investigators “it was possible” he provided Jeff TACKETT with his PII and allowed Jeff TACKETT to try to file for his unemployment, but he couldn’t remember for sure. John C. JOHNSON Sr. then told investigators when Jeff TACKETT asked him if he wanted to file for unemployment, he said “sure, go ahead.” He later told investigators he did indeed provide his PII to Jeff TACKETT.

f. John C. JOHNSON Sr. said after he was released from jail in June 2020, he saw Greg TACKETT with a stack of debit cards, including his card. John C. JOHNSON Sr. said Greg TACKETT gave him his debit card at that time, but the card did not work. Months later, in December, JEFF TACKETT gave John C. JOHNSON Sr. a new card.

46. Randall JOHNSON

a. CHYTKA told investigators that Randall JOHNSON is an acquaintance of Greg TACKETT’s through illicit drug activity. In or about July 2020, Randall JOHNSON became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about July 1, 2020, Randall JOHNSON went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. Randall JOHNSON provided his PII to CHYTKA, including his Social Security Number, birth date, and his favorite sports team (used for the purpose of a security question). Although Randall JOHNSON was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

c. On or about July 1, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on Randall JOHNSON's behalf. At the time of this filing, Randall JOHNSON already had a state-issued debit card due to disability payments which Randall JOHNSON received. The filing of this fraudulent claim resulted in not less than \$11,228.00 being paid to the debit card assigned to Randall JOHNSON, in PUA and LWAP payments. In exchange for this, Greg TACKETT provided controlled substances to Randall JOHNSON.

d. Randall JOHNSON was interviewed by investigators on January 25, 2021 while he was incarcerated at the SWVRJA-Abingdon. Randall JOHNSON admitted to investigators he knows Greg TACKETT through illicit drug activity. Randall JOHNSON admitted he occasionally went to Greg TACKETT's house in order to purchase drugs.

e. Randall JOHNSON told investigators he learned about Greg

TACKETT filing fraudulent claims when he and Curtis MULLINS were hanging out with Greg TACKETT. Randall JOHNSON was present when Greg TACKETT approached Curtis MULLINS and others and asked them to give him their personal information to file for unemployment.

f. Randall JOHNSON admitted he knew of people filing for unemployment through Greg TACKETT but denied providing his PII to Greg TACKETT or CHYTKA. Investigation determined this statement to be false. During the interview, Randall JOHNSON told investigators his favorite NFL team is the L.A. Raiders. A review of the VEC's records indicates the security question related to Randall JOHNSON's fraudulent application was "What is your all-time favorite sports team?" The answer provided to this question was "Raiders".

g. CHYTKA told investigators Randall JOHNSON personally provided his information to her to file a fraudulent claim. CHYTKA told investigators when she filed the claim, the VEC website indicated Randall JOHNSON already had a card issued to him for state benefits.

h. Randall JOHNSON also told investigators he was present when Curtis MULLINS's brothers, Eugene GRIZZLE and Ryan GRIZZLE, were discussing fraudulent claims with Greg TACKETT. Randall JOHNSON told investigators Ryan GRIZZLE said Greg TACKETT was withholding his unemployment money because Ryan GRIZZLE owed Greg TACKETT money for

drugs.

47. Marissa KISER (KISER)

a. CHYTKA told investigators that KISER is an acquaintance of Greg TACKETT's and CHYTKA's through illicit drug activity. In or about June 2020, KISER became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about June 14, 2020, KISER went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. KISER provided her PII to CHYTKA, including her Social Security Number and date of birth. Although KISER was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

c. On or about June 14, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on KISER's behalf. The filing of this fraudulent claim resulted in not less than \$17,688.00 being paid to the pre-paid debit card assigned to KISER, including PUA and LWAP payments. CHYTKA and Greg TACKETT did not provide the debit card to KISER. CHYTKA and Greg TACKETT used the debit card for their benefit while occasionally providing cash and drugs to KISER.

48. Jared W. MITCHELL (MITCHELL)

a. CHYTKA told investigators that MITCHELL was incarcerated with

Jeff TACKETT when she filed his fraudulent claim.

b. In or about June 2020, MITCHELL provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on MITCHELL's behalf.

c. On or about June 29, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on MITCHELL's behalf. The filing of this fraudulent claim resulted in not less than \$10,928.00 being paid to the pre-paid debit card assigned to MITCHELL, in PUA payments. CHYTKA and Greg TACKETT did not, however, provide the debit card to MITCHELL. CHYTKA and Greg TACKETT attempted to use the debit card for their own benefit, but the card was locked due to fraudulent activity.

d. In a recorded jailhouse telephone call on July 22, 2020, MITCHELL told Ajay JOHNSON, "Look - I don't know if you knew or not but I gave Jeff (TACKETT) my info to give to Dannielle (CHYTKA) to get that fucking money sent like they be doing, you know what I'm saying? Before Jeff got sent to max, or the SHU or whatever, before he got in that fight, he said they got my card or whatever but was waiting on a fucking pin number. So, I need you to check on that shit for me." Ajay JOHNSON responded with "Oh I got you, I will."

49. **Curtis E. MULLINS**

a. CHYTKA told investigators that Curtis MULLINS is a friend of Greg TACKETT's and Jeff TACKETT's, and the brother of Eugene GRIZZLE and Ryan GRIZZLE. In or about July 2020, Curtis MULLINS became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. On or about July 1, 2020, Curtis MULLINS went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. Curtis MULLINS provided his PII to CHYTKA, including his Social Security Number and date of birth. Although Curtis MULLINS was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system.

c. On or about July 1, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on Curtis MULLINS's behalf. The filing of this fraudulent claim resulted in not less than \$17,104.00 being paid to the debit card assigned to Curtis MULLINS, in PUA and LWAP payments. CHYTKA and Greg TACKETT did not provide the debit card to Curtis MULLINS. CHYTKA and Greg TACKETT used the debit card for their benefit. In exchange for this, CHYTKA and Greg TACKETT provided cash on several occasions to Curtis MULLINS and Greg TACKETT provided controlled substances to Curtis MULLINS.

d. Jailhouse video chats revealed that on January 27, 2021, in a recorded call to his mother, Eugene GRIZZLE acknowledged to his mother “You know how Roo filed for my unemployment?...But I ain’t eligible for unemployment...”; “I told them that Ryan (GRIZZLE) was filing for his...”; “You better tell Ryan and Brown, both to watch it!” (“Brown” is a nickname for Curtis MULLINS.) In response to this, Eugene GRIZZLE’s mother (also Curtis MULLINS’s mother) responded with “Brown’s filing for his again!”

50. Danny L. MULLINS Jr.

a. CHYTKA told investigators that Danny L. MULLINS Jr. is Greg TACKETT’s and Jeff TACKETT’s uncle. In or about June 2020, Danny L. MULLINS Jr. became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. CHYTKA told investigators that on or about June 27, 2020, Danny L. MULLINS Jr. provided his PII, including his Social Security Number and birth date, to his sister, Veronica MULLINS, who then conveyed the information to CHYTKA via Facebook Messenger. CHYTKA then filed a fraudulent claim for pandemic unemployment benefits on Danny L. MULLINS Jr.’s behalf. The filing of this fraudulent claim resulted in not less than \$18,162.00 being paid to the debit card assigned to Danny L. MULLINS Jr., in PUA and LWAP payments.

51. Eric B. MULLINS (Eric MULLINS)

a. Eric MULLINS sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits.

b. In or about July 2020, Eric MULLINS provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on Eric MULLINS's behalf.

c. On or about July 22, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on Eric MULLINS's behalf. The filing of this fraudulent claim resulted in not less than \$4,454.00 being paid to the pre-paid debit card assigned to Eric MULLINS, including PUA and LWAP payments. CHYTKA and Greg TACKETT did not, however, provide the debit card to Eric MULLINS. CHYTKA and Greg TACKETT used the debit card for their benefit until they were apprehended.

d. In a jailhouse telephone call on July 21, 2020, Eric MULLINS demonstrated his understanding of the object of the scheme, and his willing participation in the scheme when he told his girlfriend:

"you know that Danielle CHYTKA bitch? Jeff TACKETT's girl? Alright – look – that bitch has got my information, she's got like \$1,300.00 of Brian's, so she's probably got all my money too. You need to get a hold of that bitch and tell her that you want our fucking money....she's got all of my shit doin' that unemployment..."

e. In a separate jailhouse call, Eric MULLINS told the same woman to get in touch with CHYTKA and to tell her he “wants his fucking money”, and he knows his application was accepted because they sent him \$100.

52. James B. MULLINS (James MULLINS)

a. CHYTKA told investigators James MULLINS was incarcerated with Jeff TACKETT when she filed a fraudulent claim on James MULLINS’s behalf.

b. In or about June 2020, James MULLINS provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on James MULLINS’s behalf.

c. On or about June 25, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on James B. MULLINS’s behalf. The filing of this fraudulent claim resulted in not less than \$11,686.00 being paid to the debit card assigned to James MULLINS, in PUA payments. CHYTKA and Greg TACKETT did not, however, provide the debit card to James MULLINS.

Occasionally, CHYTKA sent money to inmates’ commissary accounts for James MULLINS’s use.

d. Investigators interviewed James MULLINS on January 11, 2021 while he was incarcerated at SWVRJA-Duffield. After waiving his Miranda rights, James MULLINS admitted to providing his PII to Jeff TACKETT, but maintained he

was only trying to get his “stimulus check.” Investigation determined this statement to be false.

e. A review of jail records revealed that James MULLINS was jailed in the same pod with Jeff TACKETT, John C. JOHNSON Sr., and others who admitted to filing fraudulent claims for pandemic unemployment benefits. John C. JOHNSON Sr. and Jeffery WISEMAN both told investigators that everyone in the pod sat around discussing the fraudulent unemployment claims.

f. In December 2020, after Jeff TACKETT was released from jail, Jeff TACKETT confirmed he was in possession of James MULLINS’s unemployment benefits in an email sent to James MULLINS on December 10, 2020. In response to this email on December 10, 2020, James MULLINS demonstrated his understanding of the object of the scheme, and his willing participation in the scheme.

Jeff Tackett	James Mullins	12/10/2020 5:54AM
Hey I got your unemp...		
Hey I got your unemployment shitt roo had it and I need your ss# to get into your account . i got you dawwwggg cause real is rare . love ya bro call me		
James Mullins	Jeff Tackett	12/10/2020 6:28PM
RE: Hey I got your unemp...		
[REDACTED] thats it bro real is rare and you def. keeping it 100 luv you man f you around the way tonight make that happen I need you to call Bird and heel tell you watsup [REDACTED] and I got you bro my word		

53. Steven J. MULLINS

a. CHYTKA told investigators that Steven J. MULLINS was incarcerated with Jeff CHYTKA when she filed a fraudulent claim on Steven J.

MULLINS's behalf.

b. In or about July, 2020, Steven J. MULLINS provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT then conveyed the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on Steven J. MULLINS's behalf.

c. On or about July 23, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on Steven J. MULLINS's behalf. The filing of this fraudulent claim resulted in not less than \$7,866.00 being paid to the debit card assigned to Steven J. MULLINS, including PUA and LWAP payments. CHYTKA and Greg TACKETT did not provide the debit card to Steven J. MULLINS.

d. In a recorded jailhouse telephone call on January 25, 2021, Steven J. MULLINS admitted to providing his PII to Jeff TACKETT and "trusting a friend".

54. Veronica MULLINS

a. CHYTKA told investigators that Veronica MULLINS is Greg TACKETT's and Jeff TACKETT's mother. In or about June 2020, Veronica MULLINS became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims for pandemic unemployment benefits.

b. On or about June 26, 2020, Veronica MULLINS went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT.

Veronica MULLINS told CHYTKA that she had already attempted to file for pandemic unemployment benefits but had been unsuccessful. Veronica MULLINS then asked CHYTKA if she could file for Veronica MULLINS. Veronica MULLINS provided her PII to CHYTKA and Greg TACKETT, including her Social Security Number and birth date. Although Veronica MULLINS was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system. The filing of this fraudulent claim resulted in not less than \$17,846.00 being paid to Veronica MULLINS, including PUA and LWAP payments.

c. Veronica MULLINS was interviewed by investigators on January 15, 2021. During this interview, Veronica MULLINS told investigators the following:

d. Veronica MULLINS said that she learned about the pandemic unemployment benefits from CHYTKA. Veronica MULLINS initially tried to file for pandemic unemployment benefits on her own but could not seem to get past the first part of the application. After that, she went to 108 Twin Circle Drive, Lebanon, Virginia where CHYTKA helped her file the claim.

e. Veronica MULLINS maintained she believed she was legitimately eligible for pandemic unemployment benefits. Veronica MULLINS told investigators that she had been self-employed “during the summer months – during the warmer months” when she knocked on doors and passed out fliers asking people if they wanted their homes washed, or other odd jobs, calling it a “1099 job”.

Veronica MULLINS then told investigators that CHYTKA told her the claim for pandemic unemployment benefits was legitimate. Veronica MULLINS maintained she did not know CHYTKA was filing claims fraudulently until right before Christmas. Investigation determined these statements to be false.

f. CHYTKA told investigators that to her knowledge, Veronica MULLINS had not been employed and received a check from the state (disability). CHYTKA told investigators she did not believe Veronica MULLINS was eligible for unemployment "...because I don't think she worked, um, and I'm pretty sure – like I said – she drew a social security check." In the same interview, CHYTKA told investigators everyone for whom she filed knew the claims were fraudulent.

g. In a recorded jailhouse telephone call between Veronica MULLINS and her son, Greg TACKETT on January 15, 2021, Greg TACKETT told his mother he lied to federal investigators in order to cover up for Veronica MULLINS:

Veronica MULLINS: So what'd they say about me, Roo?...

Greg TACKETT: I told them that I did it...that I filed under your name and that you didn't know, so...you'll be good, Mama. I, uh, I caught a Federal felony, but you're good though. Don't worry, I got it...

...I told them, where I did the pandemic assistance and stuff, I just told them that when I gave you the card I said that it was just pandemic assistance. That it – it was me that filed it – I did it all, so...I'm sorry – but I didn't want you in trouble and stuff, so – I didn't know what else to tell 'em.

h. In a separate recorded jailhouse telephone call from Greg TACKET to Veronica MULLINS's father, D.L.M. Sr., on February 18, 2021 Greg TACKETT says (referring to Veronica MULLINS):

"...I swear to God, man, I, uh – I guarantee it, Mom fuckin', ooh...oh, and truth be known, fuckin', she's like fuckin' tryin' to pawn it off on Danielle (CHYTKA) like Danielle did something. Bitch – you knew exactly what was...she's got me fuckin' heated, PawPaw... everything that comes out of her mouth is a goddamn lie."

i. During her interview with investigators, Veronica MULLINS also maintained it really started to hit her that the claims for unemployment were fraudulent only after CHYTKA was incarcerated in December and when Veronica MULLINS came across a monetary determination letter with her father's name on it. Investigation determined this statement also to be false. Later in the same interview, Veronica MULLINS told investigators she "might have" given her father's Social Security Number to CHYTKA for the purpose of filing a claim for pandemic unemployment benefits. Veronica MULLINS later admitted that she *did* provide CHYTKA with her father's Social Security Number to file a claim.

j. Investigation determined Veronica MULLINS provided her father's PII to Greg TACKETT and CHYTKA without lawful authority for the purpose of filing a fraudulent claim for pandemic unemployment benefits. In or about July, 2020, CHYTKA, Greg TACKETT, and Veronica MULLINS sought to obtain

pandemic unemployment benefits on behalf of D.M. Sr. (Veronica MULLINS's father), even though, as they then well knew, D.M. Sr. was not eligible to receive such benefits.

k. On or about July 10, 2020, Veronica MULLINS went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. Veronica MULLINS provided D.M. Sr.'s PII to CHYTKA and Greg TACKETT, including his Social Security Number and date of birth.

l. The filing of *this* fraudulent claim resulted in not less than \$12,444.00 being paid to the debit card assigned to D.M. Sr., including PUA and LWAP payments.

m. D.M. Sr. was interviewed by investigators and denied knowledge a claim was filed on his behalf. D.M. Sr. told investigators that he never authorized the use of his personal information for the purpose of filing a claim for pandemic unemployment benefits. Greg TACKETT, Jeff TACKETT, and Veronica MULLINS each told investigators D.M. Sr. had nothing to do with the filing of his claim.

n. Investigation determined Veronica MULLINS played an active role in the scheme. CHYTKA told investigators that Veronica MULLINS conveyed Danny L. MULLINS's PII to her via Facebook Messenger for the purpose of filing a fraudulent claim for her brother. CHYTKA also told investigators that Veronica MULLINS conveyed the PII of J.A.P. – the son of one of Veronica MULLINS's

friends – to CHYTKA for the purpose of filing a fraudulent claim.

o. Veronica MULLINS initially told investigators she had no knowledge about D&R Accounting, or any accounting business being run out of 108 Twin Circle Drive. Investigation determined this to be false. In a recorded jailhouse telephone call between Greg TACKETT and Veronica MULLINS, Greg TACKETT began talking about how when they filed claims, they did it under the accounting company. Veronica MULLINS interrupted Greg TACKETT, saying “...watch what you say...” In an interview with investigators, Veronica MULLINS described a business CHYTKA and Greg TACKETT were running out of their home where CHYTKA “was filing unemployment claims and just things like that.”

p. Several recorded jailhouse telephone calls in January 2021 between Veronica MULLINS and Greg TACKETT revealed requests by Greg TACKETT to Veronica MULLINS asking her to sell various vehicles that had been purchased with funds from the scheme. Veronica MULLINS responded that she was trying to, but that she was not able to get rid of the vehicles yet. In a separate recorded jailhouse call between Veronica MULLINS and Jeff TACKETT, Jeff TACKETT repeatedly implored his mother to sign in to his two different GMAIL accounts and to immediately delete everything. Jeff TACKETT provided his mother the email addresses and different possible passwords. Veronica MULLINS responded by saying that she would delete the accounts.

q. When interviewed, Veronica MULLINS admitted that she was trying to help CHYTKA and Greg TACKETT sell vehicles they owned, vehicles that had been purchased since the unemployment scheme began. Veronica MULLINS also admitted to attempting to delete Jeff TACKETT's GMAIL accounts after Jeff TACKETT asked her to delete the accounts, but that she was unsuccessful.

55. Patrick A. PAYNE (PAYNE)

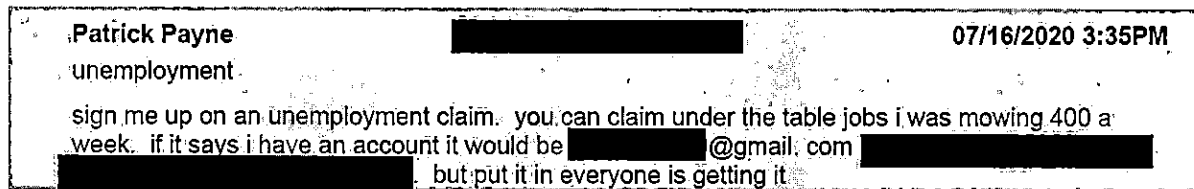
a. CHYTKA told investigators that PAYNE was incarcerated with Jeff TACKETT when she filed a fraudulent claim on PAYNE's behalf.

b. In or about June 2020, PAYNE solicited PII from a friend in order to try to file a claim for pandemic unemployment benefits on *her* behalf. An email to this friend sent while PAYNE was incarcerated demonstrates PAYNE's knowledge of the scheme and his intent to file a fraudulent claim.

Patrick Payne	[REDACTED]	06/28/2020 4:29PM
RE: What do you need fro...		
will you put some money tomorrow morning.if possible and i need your maiden name full?		
[REDACTED]	Patrick Payne	06/28/2020 4:32PM
Are you sure it is n...		
Are you sure it is not a scam I have not heard of any help that would require your moms maiden name where is this thru? Don't want you to be took anyway ok		
Patrick Payne	[REDACTED]	06/29/2020 7:22AM
RE: Pat I have not heard...		
its unemployment. It is a bussiness owner thats doing it. i will tell you more later give you the info. please send me some money this morning and ill call you.		

c. In or about July 2020, PAYNE again solicited assistance from this friend to file a fraudulent claim on his behalf. An email to this friend sent while

PAYNE was incarcerated demonstrates his knowledge of the scheme and his intent to file a fraudulent claim.



d. In or about July 2020, PAYNE provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT provided the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on PAYNE's behalf.

e. On or about July 5, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on PAYNE's behalf. The filing of this fraudulent claim resulted in not less than \$1,422.00 in PUA payments being paid to the pre-paid debit card assigned to PAYNE. CHYTKA and Greg TACKETT did not, however, provide the debit card to PAYNE.

56. Jeremy Neil Shane SHORT (SHORT)

a. CHYTKA told investigators that SHORT is Jeff TACKETT's friend. In or about June, 2020, SHORT became aware of the scheme by which CHYTKA, Greg TACKETT, and Jeff TACKETT were filing fraudulent claims.

b. SHORT sought to obtain pandemic unemployment benefits even though, as he then well knew, he was not eligible to receive such benefits. SHORT

told investigators that he had been unemployed for several months due to a drug addiction and his unemployment was unrelated to COVID-19. SHORT had been unemployed since 2019, predating the COVID-19 pandemic.

c. CHYTKA and SHORT both told investigators that on or about June 2, 2020, SHORT went to 108 Twin Circle Drive, Lebanon, VA 24266 and met with CHYTKA and Greg TACKETT. SHORT provided his PII to CHYTKA and Greg TACKETT, including his Social Security Number, birth date, and his pet's name (used for a security question). Although SHORT was present at the time of the filing, CHYTKA entered the information and filed the claim due to her familiarity with the system. The filing of this fraudulent claim resulted in not less than \$6,876.00 being paid to the debit card assigned to SHORT, including PUA and LWAP payments. CHYTKA and Greg TACKETT did not, however, provide the debit card to SHORT. CHYTKA and Greg TACKETT used the debit card for their benefit until they were apprehended.

d. SHORT told investigators that in December 2020, Jeff TACKETT took possession of several pre-paid debit cards that had been issued as part of this scheme. Jeff TACKETT provided SHORT with his card in December 2020. On January 5, 2021, SHORT was apprehended on unrelated charges, and was found in possession of the Mastercard pre-paid debit card with his name on it.

e. SHORT was interviewed by investigators on January 12, 2021 while

he was incarcerated at the SWVRJA-Duffield. After waiving his Miranda rights, SHORT admitted to knowingly filing a fraudulent claim for pandemic unemployment benefits through CHYTKA and Greg TACKETT.

f. SHORT admitted he had not been working in 2020 other than doing an odd job here and there. SHORT admitted he provided his Social Security Number, date of birth, and other information as was required for CHYTKA to file the claim. SHORT admitted he planned to give CHYTKA and Greg TACKETT some of the money he received through the fraudulent claim, "at least 10%." SHORT admitted in December 2020, he was in a Chevy Tahoe with Jeff TACKETT when he saw at least 50 debit cards he believed to be associated with the scheme.

57. Jeffrey D. WISEMAN (WISEMAN)

a. CHYTKA told investigators that WISEMAN was incarcerated with Jeff TACKETT when she filed a fraudulent claim on WISEMAN's behalf.

b. In or about June 2020, WISEMAN provided his PII to Jeff TACKETT, including his Social Security Number and date of birth. Jeff TACKETT provided the PII to CHYTKA so she could file a fraudulent claim for pandemic unemployment benefits on WISEMAN's behalf.

c. On or about June 27, 2020, CHYTKA filed a claim with the VEC seeking pandemic unemployment benefits on WISEMAN's behalf. The filing of this fraudulent claim resulted in not less than \$11,844.00 in PUA payments being paid to

the pre-paid debit card assigned to WISEMAN. CHYTKA and Greg TACKETT did not, however, provide the debit card to WISEMAN. CHYTKA and Greg TACKETT used the debit card for their benefit until they were apprehended.

d. WISEMAN was interviewed by investigators on January 12, 2021 while he was incarcerated at the SWVRJA-Duffield. After waiving his Miranda rights, WISEMAN initially denied any knowledge of anyone filing for pandemic unemployment benefits. WISEMAN maintained he had never spoken with anyone about unemployment benefits and expressly denied speaking with Jeff TACKETT about unemployment benefits. Investigation determined these statements to have been false.

e. WISEMAN said he did not file for unemployment because he “was not entitled to it because he hadn’t had a job in recent years.”

f. On December 10, 2020, after Jeff TACKETT was released from jail, Jeff TACKETT confirmed he was in possession of WISEMAN’s unemployment benefits in an email sent to WISEMAN. In response to this email on December 11, 2020, WISEMAN demonstrated his understanding of the object of the scheme, and his willing participation in the scheme by providing his Social Security Number and his date of birth.

Communications with Tackett , Jeff, Jtackett91@yahoo.com**Jeff Tackett****Jeffrey Wiseman****12/10/2020 6:00AM**

Yo my bro got you un...

Yo my bro got you unemployment I know we had our lil problem but if you want ya money i got you I need your ss# d.o.b

Jeffrey Wiseman**Jeff Tackett****12/11/2020 8:37AM**

RE: Yo my bro got you un...

[REDACTED] 1378 [REDACTED] 93

g. Investigators confronted WISEMAN with this email exchange.

WISEMAN initially denied sending this email, saying he was not familiar with the email and that the facility had a history of people hacking into his email and sending things from his email. Investigation determined these statements to be false.

h. WISEMAN eventually changed his story. WISEMAN told investigators he *had* discussed unemployment with Jeff TACKETT in June or July 2020, and WISEMAN provided his PII to Jeff TACKETT for the purpose of filing a claim. WISEMAN said Jeff TACKETT was going to ask his girlfriend to check on the status of WISEMAN's stimulus check, and that they would also try to get WISEMAN unemployment benefits as well.

i. WISEMAN explained he and Jeff TACKETT agreed if Greg TACKETT and CHYTKA filed for his unemployment, they could keep a portion of the money. WISEMAN told investigators Jeff TACKETT "got the whole pod." WISEMAN said he previously resided in pod 4A, and the unemployment scheme was common knowledge to everyone in the pod. WISEMAN described how they sat

around and discussed the unemployment claims with each other in the pod.

WISEMAN then discussed a number of other inmates in the pod with him who also signed up for pandemic unemployment benefits.

CONCLUSION

58. The aggregate *actual* loss for all fraudulent claims filed with 108 Twin Circle Drive as the application address is not less than \$499,374.00. The VEC recouped a total of \$43,444.00. The net realized loss to the United States is not less than \$455,930.00.

59. Based upon the above information, I aver there is probable cause to believe the individuals listed below have violated the federal statutes as indicated below, as principals or aiders and abettors (18 U.S.C. § 2):

**NOTE: In support of the charge of Aggravated Identity Theft (18 USC § 1028A) for all co-conspirators, your Affiant relies on the holding in United States v. Otuya, 720 F.3d 183 (4th Cir. 2013), which holds in part that "no amount of consent from a co-conspirator can constitute "lawful authority" to engage in the kind of deplorable conduct...engaged in here." Id. at 189. ("One does not have lawful authority to consent to the commission of an unlawful act.")*

**NOTE: The entirety of this affidavit is provided in support of all co-conspirators listed below. Pertinent, individual facts pertaining to the individuals can be found at the paragraphs referenced below.*

Jimmy W. BARNETTE (Paragraph 35)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud)
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	18 U.S.C. § 1028A (Aggravated Identity Theft) 18 U.S.C. § 1001 (False Statement)
George L. BUCKLES (Paragraph 36)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. 1028A (Aggravated Identity Theft) 18 U.S.C. § 1001 (False Statement)
Joshua S. CARROLL (Paragraph 37)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Eugene A. GRIZZLE (Paragraph 38)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Ryan E. GRIZZLE (Paragraph 39)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Joseph N. HALL (Paragraph 40)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Wesley W. HICKMAN (Paragraph 41)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits)

	18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Jacob H. HICKS (Paragraph 42)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Ajay JOHNSON (Paragraph 43)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
John C. JOHNSON Jr. (Paragraph 44)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
John C. JOHNSON Sr. (Paragraph 45)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Randall D. JOHNSON (Paragraph 46)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S.) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)

	18 U.S.C. § 1001 (False Statement)
Marissa L. KISER (Paragraph 47)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Jared W. MITCHELL (Paragraph 48)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Curtis E. MULLINS (Paragraph 49)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Danny L. MULLINS Jr. (Paragraph 50)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Eric B. MULLINS (Paragraph 51)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
James B. MULLINS (Paragraph 52)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)

	18 U.S.C. § 1001 (False Statement)
Steven J. MULLINS (Paragraph 53)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Veronica S. MULLINS (Paragraph 54)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft) 18 U.S.C. § 1001 (False Statement) 18 U.S.C. § 1512(k) (Conspiracy to Obstruct)
Patrick A. PAYNE (Paragraph 55)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Jeremy N.S. SHORT (Paragraph 56)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1040(a)(1,2) (Fraud in Connection with Emergency Relief Benefits) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft)
Jeffrey D. WISEMAN (Paragraph 57)	18 U.S.C. § 371 (Conspiracy to Defraud the U.S) 18 U.S.C. § 1349/1341 (Conspiracy to Commit Mail Fraud) 18 U.S.C. § 1341 (Mail Fraud) 18 U.S.C. § 1028A (Aggravated Identity Theft) 18 U.S.C. § 1001 (False Statement)

60. The above information is true and correct to the best of my knowledge,

information, and belief.

Respectfully submitted,

Joseph Harrilla

Joseph Harrilla

Special Agent

United States Department of Labor

Office of Inspector General

Subscribed and sworn to before me telephonically

on March 31st, 2021:

Camela Meade Sayert

UNITED STATES MAGISTRATE JUDGE